

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

NATIONAL SALVAGE & SERVICE
CORPORATION,

Plaintiff,

v.

C.A. No. 22-1428-TMH

SULA VALLEY BIOGAS, SA DE
C.V., and HONDURAN GREEN
POWER CORPORATION,

Defendants.

AFFIDAVIT OF ATTORNEYS' FEES AND EXPENSES

I, Adam D. Zacher, being first duly sworn upon my oath, depose and state that I am an adult over 18 years of age, have personal knowledge of and am competent to testify to the following facts:

1. I am an attorney licensed to practice law in the State of Indiana, and my firm, Taft Stettinius & Hollister LLP (“Taft”), has been engaged to represent the Plaintiff, National Salvage & Service Corporation (“NSSC” or “Seller”) in this action.

2. Riddhi Dasgupta and I have been admitted by this court to represent NSSC in this matter *pro hac vice*.

3. I have been practicing law for approximately 6.5 years, and I concentrate my practice on commercial litigation matters.

4. NSSC has incurred legal fees and costs from Taft in the amount of \$39,508.40 in issuing its demands to Defendants, Sula Valley Biogas, SA DE C.V. (“Sula Valley”) and Honduran Green Power Corporation (“HGPC” and together with Sula Valley, the “Buyer”); preparing its Complaint; obtaining a default, and filing its Application for Default Judgment.

5. The breakdown of fees and costs provided by Taft are as follows:

TIMEKEEPER	HOURS	FEES
Riddhi Dasgupta	26	\$17,550.00
Adam D. Zacher	49.2	\$20,842.50
Jennifer Burgess	1.7	\$431.00
Denine Del Balso	1.0	\$255.00

6. In total, Taft has provided 78.9 hours of legal services to date, including but not limited to activities such as:

- a. Drafting the complaint;
- b. Researching and working on application for default; and
- c. Working on the Application for Default Judgment.

7. Based on the factors set forth in Rule 1.5 of the Delaware Lawyers' Rules of Professional conduct, it is my opinion that \$39,508.40 is a reasonable award of attorneys' fees incurred for the work that Taft has performed in pursing NSSC's claims against the Buyer.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 2/24/2023


Adam D. Zacher
 Adam D. Zacher